



Amy G. Rabinowitz
Counsel

December 1, 2004

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

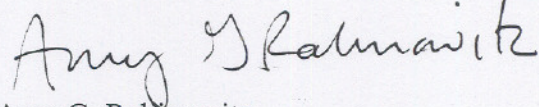
Re: D.T.E. 04-106

Dear Secretary Cottrell:

I am enclosing for filing Massachusetts Electric Company's Petition for Limited Participation Status in the above-captioned matter.

Thank you very much for your time and attention to this matter.

Very truly yours,


Amy G. Rabinowitz

cc: Stephen Klionsky
Angela O'Connor
Joseph W. Rogers

25 Research Drive
Westborough, MA 01582-0099
Phone 508.389.2975
Fax: 508.389.2463
amy.rabinowitz@us.ngrid.com

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Western Massachusetts Electric Company)
_____)

D.T.E. 04-106

**PETITION FOR LIMITED PARTICIPATION STATUS OF
MASSACHUSETTS ELECTRIC COMPANY**

Massachusetts Electric Company ("MEC" or the "Company") hereby submits this petition to the Department of Telecommunications and Energy ("Department") for permission to participate as a limited participant in the above-captioned proceeding, pursuant to 220 CMR 1.02(1)(e). The Company states the following in support of its petition:

1. MEC is a Massachusetts electric company subject to the regulatory jurisdiction of the Department with a principle place of business at 55 Bearfoot Road, Northborough, Massachusetts 01532.
2. MEC provides electricity service to customers in 168 cities and towns in Massachusetts.
3. The Department has issued a Notice of Filing and Public Hearing stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by December 2, 2004.
4. In conducting adjudicatory hearings, the Department may "allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for

any other limited purpose” as the Department may order. Mass. Gen. Laws, c. 30A, § 10; see also 220 CMR 1.03(1)(b).

5. MEC has an interest in participating in this proceeding because it addresses issues relating to distribution rates and the transition charge. Many of the issues raised in this proceeding may be similar to issues raised in proceedings concerning MEC.

6. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U. 96-25 (review of electric restructuring settlement); *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management proceeding); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).

7. Given its position as a Massachusetts regulated utility, MEC may have information that will aid the Department in its evaluation of this proceeding.

8. MEC requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to the persons identified below:

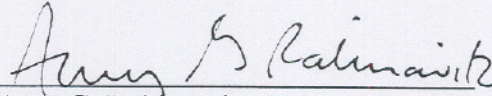
Amy G. Rabinowitz
Counsel
Massachusetts Electric Company
25 Research Drive
Westboro, MA 01582
amy.rabinowitz@us.ngrid.com

9. In the event that MEC is granted limited intervention status, MEC will accept whatever procedural schedule is proposed, and does not intend to burden the record in this proceeding.

WHEREFORE, MEC respectfully requests that the Department allow its petition for limited participation status in this proceeding.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY
By its attorney,


Amy G. Rabinowitz
25 Research Drive
Westboro, MA 01582

Dated: December 1, 2004